

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

SHALAN SAMONA,  
an individual resident of the State of Michigan;

Plaintiff,

Case No. 2:10-CV-13691

vs.

Hon. Robert H. Cleland

ROBERT BRADLEY,  
an individual resident of the State of Michigan;  
RCA MUSIC GROUP,  
a division of Sony Music Entertainment, Inc.;

Defendants

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**STIPULATED PROTECTIVE ORDER**

This matter having come before the Court upon stipulation and agreement by and between the parties hereto, through their respective counsel of record;

THE COURT HEREBY ENTERS THIS PROTECTIVE ORDER UNDER THE FOLLOWING TERMS AND CONDITIONS:

IT IS ORDERED THAT a single, 15-page Publisher Earnings Report relating to royalties (“Royalty Document”) produced to Plaintiff’s counsel by Defendant Sony Music Entertainment, Inc. (“SME”) shall be subject to the terms of this Protective Order.

IT IS FURTHER ORDERED that the Royalty Document provided to Plaintiff's counsel is subject to the following conditions:

(1) The Royalty Document shall not be made public or provided to others outside the scope of this Order.

(2) The Royalty Document may be shown to Plaintiff and to those persons employed at Plaintiff's counsel's office who have a need to see the Royalty Document.

(3) The Royalty Document can be shown to one damages expert retained by Plaintiff.

(4) Those persons being shown the Royalty Document must also be shown this Protective Order and Plaintiff's counsel must obtain those persons' concurrence to abide by the terms of this Protective Order by execution of a receipt of this Order.

(5) The original and all copies of the Royalty Document shall be returned to SME's counsel at the conclusion of this litigation and any appellate proceedings.

(6) The terms of this Protective Order can only be modified by way of an Order obtained either through a stipulation or subsequent motion.

The Royalty Document shall be used by Plaintiff and his attorney in this case only, and for no other purpose. The Royalty Document, and all copies, prints, summaries, excerpts and/or reproductions of such documents, are subject to this Order.

The Royalty Document may not be shown to anyone other than as stated in this Order. However, nothing in this Order is intended to impair or create rights in the parties to offer or use the Royalty Document during trial. Issues regarding admissibility will be resolved by the Court at the appropriate time.

IT IS FURTHER ORDERED that the Royalty Document shall not be filed with the Court unless under seal pursuant to Fed.R.Civ.P. LR 5.3.

10/29/10

s/Robert H. Cleland  
DISTRICT COURT JUDGE

Approved as to form and substance:

**HONIGMAN MILLER SCHWARTZ  
AND COHN LLP**

**DOBRUSIN & THENNISCH, PC**

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